

**IN THE UNITED STATES DISTRICT COURT  
FOR THE NORTHERN DISTRICT OF ILLINOIS  
EASTERN DIVISION**

WRI PALOMINO TRACE INVESTORS, L.P., a	)	
Washington partnership	)	
	)	
Plaintiff,	)	
v.	)	No. 08 CV 4180
	)	
PALOMINO TRACE LLC; GV DEVELOPMENT LTD,	)	
LARGO PARTNERS II LLC, GEORGE VENTUTELLA	)	
and TERRI VENTURELLA,	)	Judge James F. Holderman
	)	
Defendants.	)	

**NOTICE OF MOTION**

TO: Faye B. Feinstein  
Lauren N. Nachinson  
Quarles & Brady LLP  
500 West Madison Street, Suite 3700  
Chicago, Illinois 60661

PLEASE TAKE NOTICE that on Thursday, September 4, 2008, at 9:00 a.m. or as soon thereafter as counsel may be heard, I shall appear before the Honorable Judge James F. Holderman or any other judge sitting in his stead, in Courtroom 2541, at 219 South Dearborn, Chicago, Illinois, and then and there present the attached **MOTION FOR EXTENSION OF TIME TO ANSWER OR OTHERWISE PLEAD**, at which time and place you may appear as you see fit to.

/s/ Cornelius P. Brown  
\_\_\_\_\_  
Cohon Raizes & Regal LLP

**PROOF OF SERVICE**

Cornelius P. Brown, an attorney, being first duly sworn on oath, deposes and says that she served a copy of the attached **MOTION FOR EXTENSION OF TIME TO ANSWER OR OTHERWISE PLEAD** upon the above attorneys via first class mail by depositing same, postage prepaid, before 5:00 p.m. in the United States Mail at Chicago, Illinois, on August 25, 2008, and caused a copy to be served upon the above attorneys via email through the Electronic Case Filing System of the Northern District of Illinois, Eastern Division.

/s/ Cornelius P. Brown

Cornelius P. Brown (ARDC No. 0312355)  
Carrie A. Dolan (ARDC No. 6224808)  
Cohon Raizes & Regal LLP  
208 S. LaSalle Street, Suite 1860  
Chicago, Illinois 60604  
(312)726-2252